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International Specialists in the Environmental Sciences



DATE: March 16, 1984
TO: Tore Stole
FROM: Cynthia Bachunas
SUBJECT: Response to EPA QC Comments

The following are comments in response to the HRS Quality Check performed by EPA staff for each of the four (4) sites reviewed.

(1) Grand Rapids, MI/Lack Industries, Inc. - Since the score change resulted solely from the correction of a math error, the change is warranted.

(2) Romeo, MI/South Macomb Disposal Authority (Site #11) - Although the score change for the hazardous waste quantity value is warranted in the groundwater route, the reason stated by the EPA reviewer in the documentation record is not valid. According to the Supplemental Instructions for the HRS from Steve Caldwell, in cases where an aquifer is known to be contaminated (i.e., a positive observed release) and "no reasonable estimate [of the hazardous waste quantity] can be made, the waste quantity should be established as '1' (any waste quantity greater than 0)." It is unknown what guidance the EPA reviewer was following when documenting his decision for the change. The change in the value assigned to the combined distance to nearest well/population served matrix score is also warranted since it resulted solely from the correction of a math error.

In the surface water route, the change in the facility slope and intervening terrain value is not warranted. Further examination of the Romeo, Michigan 1968 (PR 1973) quadrangle map shows that the surface water referenced as "unnamed pond on-site" is actually a man-made depression that does not connect with other surface

water bodies and is, therefore, not eligible for consideration. Reference to this "pond" should be deleted from the documentation record and the terrain slope should be based upon the calculation for "Dollar Creek." The resulting facility slope and intervening terrain value is therefore, zero (0) not three (3) as scored by the EPA reviewer. Please note that this change will result in a total route characteristics score of "7" rather than "10." Also in the surface water route, the hazardous waste quantity value should remain zero (0) as assigned by the original scorer. Since there is no known surface water contamination (i.e., positive observed release) the hazardous waste quantity value should be zero (0) for this route. As discussed in groundwater, it is unknown what guidance the EPA reviewer was following when documenting his decision. Please note that this change will result in a total waste characteristics score of "18" rather than "19." Based upon the above changes to the surface water route, the $S_{sw}$ will be 18.80; resulting in a change in the $S_m$ score to 39.46.

(3) Rochester, MI/Sandfill Landfill #2 - Since the hazardous waste quantity and toxicity/persistence values are indeed based upon heresay rather than upon documentable evidence, all reference to the disposal of 900 tons of halogenated aliphatics should be deleted from the documentation record. However, since there are no other records indicating that any hazardous wastes were disposed at the facility, the site is no longer eligible for listing. Unless records substantiating the disposal of any hazardous wastes at the site can be located, it is recommended that this site be dropped from further consideration. (Please note that the information supplied by Mr. Jerome Eby of Avon Charter Township does not supply any information concerning the disposal of hazardous waste at the site as was expected by Jim Knoy.)

(4) Belleville, MI/Wayne Disposal II - As suggested by the February 27, 1984 memorandum from Richard E. Bartelt, U.S. EPA to Rene Van Someren, E & E, the Wayne Disposal Site II in Belleville, Michigan has been rescored with a value of zero (0) assigned to the observed release to groundwater. A copy of the rescoring is attached. It is suggested, however, that the EPA explore the possibility of conducting a more thorough groundwater study in order to better understand and characterize the groundwater contamination problem known to exist in the area.

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